

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

In re: Gold King Mine Release in San Juan  
County, Colorado on August 5, 2015

*This Document Relates to:*  
**ALL CASES**

No. 1:18-md-02824-WJ

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME  
REGARDING PERSONAL JURISDICTION MOTIONS**

In order to accommodate ongoing discussions to resolve this matter, the State of New Mexico and the New Mexico Environment Department (together “New Mexico”), the Navajo Nation, Kinross Gold U.S.A., Inc. (“KGUSA”), Kinross Gold Corporation (“KGC”), and Sunnyside Gold Corporation (“SGC”) hereby stipulate to the following extension of time for New Mexico and the Navajo Nation to respond to: (1) *Kinross Gold U.S.A., Inc. and Kinross Gold Corporation’s Motion for Summary Judgment on the Claims of New Mexico, the Navajo Nation, Utah, and the Allen Plaintiffs: Personal Jurisdiction* (Dkt. 866); and (2) *Sunnyside Gold Corporation’s Motion for Summary Judgment on Grounds of Lack of Personal Jurisdiction* (Dkt. 868) (the “Personal Jurisdiction Motions”).

1. New Mexico and the Navajo Nation shall be given an extension to file and serve response(s) to the Personal Jurisdiction Motions, making such response(s) due January 8, 2020.
2. SGC, KGUSA, and KGC shall have until January 22, 2021 to file and serve any reply brief(s) in support of the Personal Jurisdiction Motions as to New Mexico and the Navajo Nation.

Dated: December 23, 2020

Respectfully submitted,

/s/ William J. Jackson  
William J. Jackson  
NM Fed. Bar 16-102  
John D.S. Gilmour  
NM Fed Bar. 16-101  
Lana M. Rowenko  
Jennifer C. Barks  
KELLEY DRYE & WARREN LLP  
515 Post Oak Blvd., Suite 900  
Houston, TX 77027  
Telephone: (713) 355-5000  
Facsimile: (713) 355-5001  
Email: lrowenko@kelleydrye.com

Andrew W. Homer  
KELLEY DRYE & WARREN LLP  
7825 Fay Avenue, Suite 200  
La Jolla, CA 92037  
Telephone: (310) 712-6199  
Email: ahomer@kelleydrye.com

Hector Balderas  
Attorney General of New Mexico  
P. Cholla Khoury  
Assistant Attorney General  
408 Galisteo Street  
Villagra Building  
Santa Fe, NM 87501  
Telephone: (505) 827-6000  
Facsimile: (505) 827-5826  
Email: ckhoury@nmag.gov

Marcus J. Rael, Jr.  
Robles, Rael & Anaya, P.C.  
500 Marquette Ave NW, Suite 700  
Albuquerque, NM 87102  
Telephone: (505) 242-2228  
Facsimile: (505) 242-1106  
Email: marcus@roblesrael.com

*Attorneys for Plaintiff*  
THE STATE OF NEW MEXICO

Dated: December 23, 2020

/s/ Andrew K. Walsh

John C. Hueston  
Moez M. Kaba  
Andrew K. Walsh  
HUESTON HENNIGAN LLP  
523 West Sixth Street, Suite 400  
Los Angeles, CA 90014

NAVAJO NATION DEPARTMENT OF  
JUSTICE  
Paul Spruhan  
Office of the Attorney General  
P.O. Box 2010  
Window Rock, AZ 86515

*Attorneys for Plaintiff*  
THE NAVAJO NATION

Dated: December 23, 2020

/s/ Neil G. Westesen

Neil G. Westesen (admitted pro hac vice)  
CROWLEY FLECK PLLP  
1915 South 19thStreet  
PO Box 10969  
Bozeman, MT 59719-0969  
Telephone: (406) 556-1430  
Facsimile: (406) 556-1433  
nwestesen@crowleyfleck.com

Jeffery J. Oven (admitted pro hac vice)  
Pamela C. Garman (admitted pro hac vice)  
490 North 31stStreet, Suite 500  
PO Box 2529  
Billings, MT 59103-2529  
Telephone: (406) 252-3441  
Facsimile: (406) 252-5292  
joven@crowleyfleck.com  
pgarman@crowleyfleck.com

Attorneys for Defendant Sunnyside Gold Corporation

Dated: December 23, 2020

/s/ Bradford C. Berge

Bradford C. Berge  
Jules Elese Angelley  
HOLLAND & HART LLP  
P.O. Box 2208  
110 N. Guadalupe, Ste. 1  
Santa Fe, NM 87504-2208  
TEL: 505-988-4421  
FAX: 505-983-6043  
bberge@hollandhart.com  
jeangelley@hollandhart.com

Attorneys for Defendants Kinross Gold U.S.A., Inc. and Kinross Gold Corporation

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No. 1:18-md-02824-WJ

**[PROPOSED] ORDER FOR EXTENSION OF TIME REGARDING PERSONAL**

**JURISDICTION MOTIONS**

Based on the stipulation among the State of New Mexico and the New Mexico Environment Department (together “New Mexico”), the Navajo Nation, Kinross Gold U.S.A., Inc. (“KGUSA”), Kinross Gold Corporation (“KGC”), and Sunnyside Gold Corporation (“SGC”), and for good cause shown, IT IS HEREBY ORDERED as follows:

1. New Mexico and the Navajo Nation shall file and serve their response(s) to (1) Kinross Gold U.S.A., Inc. and Kinross Gold Corporation’s Motion for Summary Judgment on the Claims of New Mexico, the Navajo Nation, Utah, and the *Allen* Plaintiffs: Personal Jurisdiction (Dkt. 866) and (2) Sunnyside Gold Corporation’s Motion for Summary Judgment on Grounds of Lack of Personal Jurisdiction (Dkt. 868) on or before January 8, 2020.

2. KGUSA, KGC, and SGC shall file and serve any reply brief(s) in support of the same motions as to New Mexico and the Navajo Nation on or before January 22, 2021.

IT IS SO ORDERED.

Dated: December \_\_, 2020

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Special Master Hon. Alan C. Torgerson

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2020, a true copy of the foregoing document has been served on all counsel of record by the Court's CM/ECF electronic filing system.

*/s/ William J. Jackson*  
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William J. Jackson